

### **REMARKS**

The Office Action dated January 25, 2008, has been received and carefully noted. The above amendments to the specification and claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1, 2, 4-8, and 10-24 have been amended to more particularly point out and distinctly claim the subject matter of the invention. Claims 1-24 are respectfully submitted for consideration.

The disclosure was objected to because of it allegedly contains an embedded hyperlink and/or other form of browser-executable code. This rejection is respectfully traversed. The specification only includes a URL in typed form. There is no embedded hyperlink or other form of browser-executable code. As such, it is respectfully requested that the objection to the specification be withdrawn.

Claims 1-24 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,970,476 of Jonsson et al. (Jonsson) in view of U.S. Patent Publication No. 2003/00122788 of Banerji et al. (Banerji). The Office Action asserted that Jonsson and Banerji describe all of the features of claims 1-24. This rejection is respectfully traversed.

Independent claim 1, upon which claims 2-5 are dependent, recites a method that includes updating a compression history selectively, wherein selection is performed based on a first algorithm for determining whether a packet shall be compressed, and on a

second algorithm for determining whether a compressed packet shall be used for an update of the compression history.

Independent claim 6, upon which claims 7-10 are dependent, recites a method that includes using a first algorithm in conjunction with a compressing device to decide if a current packet should be compressed. The method also includes using a second algorithm in conjunction with the compressing device to decide which packets out of packets sent compressed are to be used to update a buffer of the compressing device. The method additionally includes signaling from the compressing device to a decompressing device such that the decompressing device knows which of the packets out of the packets sent are to be included in a compression history.

Independent claim 11, upon which claims 12-14 are dependent, recites an apparatus that includes a processor configured to update a compression history selectively, the processor having implemented and being configured to process a first algorithm related to whether a packet shall be compressed, and a second algorithm related to whether a compressed packet shall be used for an update of the compression history.

Independent claim 15, upon which claims 16-18 are dependent, recites an apparatus that includes a transmitter configured to signal to a decompression device which of a first set of packets are to be included in a compression history, the transmitter having implemented and processing a first algorithm used to decide if the current packet should be compressed. The apparatus also includes processing means for having a processor configured to have implemented and processing a second algorithm, wherein

the second algorithm is used to determine which of a second set of packets out of a third set of packets sent compressed are to be used to update a buffer, wherein the processor is operably connected to the signaling unit.

Independent claim 19, upon which claims 20 and 21 are dependent, recites an apparatus that includes a receiver configured to receive signals from a compression device indicating which packets are to be included in a compression history. The apparatus additionally includes a processor configured to process a packet sequence number for updating the buffer means in synchronization with the compression device, wherein the processing means is operably connected to the receiving means.

Independent claims 22-24 recite means-plus-function variations of one of the above claims.

As will be discussed below, Applicant respectfully submits that Jonsson and Banerji fail to disclose or suggest all of the elements of the presently pending claims.

Jonsson generally describes packet communications that utilize header compression/decompression, relatively fast and reliable header compression context updates can be accomplished with relatively low overhead by: sending anticipatory context update requests before decompressor context invalidation is detected; sending redundant context update requests; and sending redundant context updates. Transmission parameters associated with both context update requests and context updates can be controlled appropriately to improve their chances for delivery, and needless context

update requests can be identified and ignored at the header compression side. See abstract of Jonsson.

Banerji generally describes a system and method for compressing video that video frames that between consecutive I-frames are grouped into a video data set. The video data set is split into separate homogeneous files, and each of the homogeneous files are individually compressed. The individually compressed files are multiplexed to form a bit stream.

Applicant respectfully submits that the combination of Banerji and Jonsson fails to disclose or suggest all of the features of claims 1, 6, 11, 15, 19, and 22-24. For example, Applicant respectfully submit that Jonsson fails to disclose or suggest, at least, “updating a compression history selectively, wherein selection is performed based on a first algorithm for determining whether a packet shall be compressed, and on a second algorithm for determining whether a compressed packet shall be used for an update of the compression history,” as recited in the presently pending claims. The Office Action relied on column 11, lines 10-19, of Jonsson as allegedly disclosing the above limitation.

However, column 11, lines 10-19, of Jonsson merely describes that the context control information that includes a context update request, further comprising receiving the context update request at the second packet communication station, determining whether a context update corresponding to the received context update request has already been sent from the second packet communication station to the first packet communication station, and ignoring the received context update request if a

corresponding context update has already been sent from the second packet communication station to the first packet communication station. The cited portion does not provide any description of updating a compression history selectively.

The Office Action acknowledged that Jonsson does not disclose wherein said compression history and first and second algorithm for determining whether a packet shall be compressed. The Office Action then relied on paragraph [0010] and paragraph [0011] of Banerji as curing the deficiencies in Jonsson.

However, paragraph [0010] of Banerji merely describes that the motion data information of each I-frame distance set is split into a set of homogenous files, based on whether the component represents horizontal or vertical motion, whether the frame is P- or B-type, and so on. Horizontal motion components for P frames are stored in one file, while vertical motion components for P frames are stored in another file. An additional file is formed that stores the motion compensation modes. These files are then individually compressed using a suitable lossless data compression algorithm that can exploit data history from the beginning of each file. Because the files are homogeneous, the statistical properties of all the data in each separate file are similar and the motion data can therefore be compressed to a much greater extent than if the motion data were not separated.

Paragraph [0011] of Banerji merely discloses that the quantized transform coefficient data, on the other hand, are first represented in a bit-plane fashion. The quantized transform coefficient data are split into a set of files corresponding to different

bit-planes of the quantized transform coefficient data, and an additional file is formed that provides information about the number of bit-planes for each block in a frame. These bit-plane files are further compressed using run-length encoding. The run-length encoded files and the additional file are then individually coded using a suitable lossless data compression algorithm that can exploit data history from the beginning of each file.

Thus, Applicant respectfully submits that Banerji does not cure the deficiencies in Jonsson as failing to disclose or suggest, at least, “updating a compression history selectively,” as recited in the presently pending claims. Instead, Banerji merely describes that the files are compressed using a suitable lossless data compression algorithm that can exploit data history from the beginning of each file. Banerji does not update the compression history selectively, wherein selection is performed based on a first algorithm for determining whether a packet shall be compressed, and on a second algorithm for determining whether a compressed packet shall be used for an update of the compression history. The portion of Banerji, “compression algorithm that can exploit data history from the beginning of each file” does not provide any description of the first and second algorithm for determining whether a packet shall be compressed of the present claims. Further, in Banerji, the history does not correspond to the compression history of the present claims.

Therefore, Applicant respectfully submits that the combination of Jonsson and Banerji fails to disclose or suggest all of the features of claims 1, 11, 19, and 22, and

similarly recited in claims 2, 15, 23, and 24. As such, it is respectfully requested that claims 1, 6, 11, 15, 19, and 22-24 be withdrawn.

It would not have been obvious to a person of ordinary skill in the art to modify the teachings of Jonsson and Banerji to arrive at the present claims because Banerji and Jonsson do not disclose or suggest all of the features of the presently pending claims.

Claims 2-5, 7-10, 12-14, 16-18, and 20-21 are dependent upon claims 1, 6, 11, 15, and 19. Thus, claims 2-5, 7-10, 12-14, 16-18, and 20-21 should be allowed for at least their dependence upon claims 1, 6, 11, 15, and 19, and for the specific limitations recited therein.

For the reasons explained above, it is respectfully submitted that each of claims 1-24 recites subject matter that is neither disclosed nor suggested in the cited art. Also, it is respectfully submitted that the subject matter is more than sufficient to render the claimed invention unobvious to a person of ordinary skill in the art. It is, therefore, respectfully requested that all of claims 1-24 be allowed, and that this application be passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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